

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WASHINGTON

In re

CHRISTINA DIANN SANTOS

Debtor.

No. 23-41082

*EX PARTE* APPLICATION FOR  
EMPLOYMENT OF COUNSEL FOR  
TRUSTEE

COMES NOW Kathryn A. Ellis, the duly appointed Chapter 7 Trustee for the above-captioned bankruptcy estate ("Trustee"), and for her *Ex Parte* Application for Appointment of Counsel for Trustee, states as follows:

1. The Trustee believes that her interests and the estate's interests can best be represented by retaining legal counsel. Specifically, legal counsel will be of assistance regarding the investigation and litigation of avoidance claims. Given the fact that there are no funds in the estate currently to pay counsel, outside counsel does not appear feasible. Further, given my knowledge of the essential facts in this case, it would appear economical.

2. The Trustee wishes to retain herself as counsel in this proceeding, at the regular hourly rate of \$425.00 per hour. No retainer has been promised or provided.

3. Based upon of the Declaration of Disinterest submitted herewith, the Trustee is aware of no connections between herself and the debtor, creditors, any party in interest, their respective attorneys and accountants, the United States Trustee, or any person employed in the office of the United States Trustee other than as set forth above.

WHEREFORE, the Trustee requests that the Court enter an *ex parte* order authorizing

1 Kathryn A. Ellis to represent the Trustee and her interests in any and all legal matters that may  
2 arise during the administration of this case.

3 No notice to creditors of this application is necessary pursuant to 11 U.S.C. § 102 (1) and  
4 FRBP 2002.  
5

6 WHEREFORE, the Trustee prays for an order accordingly.

7 DATED this 21<sup>st</sup> day of September, 2023.  
8

9 /s/ Kathryn A. Ellis  
Kathryn A. Ellis, Trustee

10 The undersigned declares under the penalty of perjury that she provided the Office of the  
11 United States Trustee with a copy of this Application, Declaration of Disinterest and  
12 proposed order pursuant to LBR 2014-1 (b) and has received authorization from the  
13 Office of the United States Trustee to file the same.

14 DATED this      day of September, 2023 at Seattle, Washington.

15 /s/ Janice L. Galus  
16 Janice L. Galus  
17 Assistant to Kathryn A. Ellis

18 P:\OneDrive - Kathryn A Ellis\Shared\KAE\Dox\TRUSTEE\CSantos\ellis\_app.wpd  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28